

BILLY J. WILLIAMS, OSB #901366
United States Attorney
District of Oregon
GEOFFREY A. BARROW
Assistant United States Attorney
Geoffrey.Barrow@usdoj.gov
1000 SW Third Avenue, Suite 600
Portland, OR 97204-2902
Telephone: (503) 727-1000
Attorneys for United States of America

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

UNITED STATES OF AMERICA

6:06-cr-60011-AA-1

v.

**GOVERNMENT'S SUPPLEMENTAL
MEMORANDUM**

JOSEPH DIBEE,

Defendant.

Defendant's Motion for Reconsideration of this Court's Detention Order is pending. The Court has directed the government to supplement the record regarding how the transcript of defendant's June 11, 2019 call was translated and to produce a recording of the call to defendant's counsel.

1. Defendant's June 11, 2019 Call Was Recorded by BOP and Translated by a Government Contractor

To answer the Court's question, the government contacted a Supervisory Attorney with the Federal Bureau of Prisons (BOP) and was referred to David Prock, a Special Investigative

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Services Technician at FCI Sheridan. Mr. Prock reviewed Dibee's record and explained that Dibee's personal calls are subject to monitoring pursuant to BOP policy. Portions of the June 22, 2019 call were in Arabic and therefore could not be reviewed by FCI Sheridan personnel. Accordingly, FCI Sheridan sent the call to a government contractor for translation and transcription. The contractor, Advanced Language Systems International (ALSI), is based in Rockville, Maryland. According to its website, www.alsi-inc.net, ALSI has been in business for more than twenty years and offers services in more than 150 languages and dialects. The website describes their quality control process as follows:

ALSI utilizes a unique, four-part quality control system that ensures translations will be technically accurate and culturally appropriate. After the initial translation is complete, a second translator reviews both the original and translated text. The document is then processed by a quality assurance specialist to ensure that every aspect from spelling to formatting meets our high standards. Before returning a completed translation to the client, a project manager personally reviews and approves the document.

See Advanced Language Systems International, Frequently Asked Questions, <http://www.alsi-inc.net/faq.html> (last visited April 9, 2020).

2. The Audio Recording of the June 11, 2019 Call Was Purged from the System

According to Mr. Prock, BOP's call monitoring system automatically purges recorded calls from the system after ninety days. At my request, Mr. Prock searched the system and FCI Sheridan's files and determined that the recording was purged from the system and that FCI Sheridan did not retain a copy of the recording.

3. Miscellaneous

Due to the threatening nature of the June 11, 2019 call, FCI Sheridan generated an Incident Report that was provided to the defense with the transcript. The report appears to be

incomplete in that it does not reflect what action FCI Sheridan took regarding the incident. My understanding is that BOP transferred defendant from FCI Sheridan due to this incident. The government has asked Mr. Prock to provide any additional materials related to this incident. The government will forward any such materials to the defense as soon as possible.

Dated: April 10, 2020

Respectfully submitted,

BILLY J. WILLIAMS
United States Attorney

s/ Geoffrey A. Barrow
GEOFFREY A. BARROW
Assistant United States Attorney